

MEMO ENDORSED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EVERYDAY HEALTH, INC.,

Plaintiff,

v.

RVO HEALTH LLC and KEENAN
KLINGER,*Defendants.*

Civil Action No. _____

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1-2-25**UNOPPOSED MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER**

Plaintiff Everyday Health, Inc. ("Everyday Health"), pursuant to Federal Rule of Civil Procedure 26(c), moves this Court to enter the Proposed Protective Order (the "Protective Order"), which is attached hereto as Exhibit 1, which has been jointly negotiated and agreed to between Everyday Health, RVO Health, LLC ("RVOH"), and Keenan Klinger ("Klinger"). In support of this Motion, Everyday Health states as follows:

1. Pursuant to Federal Rule of Civil Procedure 26(c), the parties may move the Court for a protective order to assist in managing discovery issues.
2. RVOH and Klinger are currently parties to a litigation pending in the United States District Court for the Western District of North Carolina (*RVO Health, LLC v. Keenan Klinger*, Civil Action No. 3:24-cv-00834-MOC-SCR) (the "North Carolina Litigation").
3. In connection with the North Carolina Litigation, RVOH has issued a subpoena to Everyday Health (the "Subpoena").

SO ORDERED

LEWIS A. KAPLAN, USDC SDNY

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